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Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR  
INTERIM COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED  
BY APPLICANTS FROM APRIL 1, 2022 THROUGH JULY 31, 2022**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On October 31, 2022, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from April 1, 2022 through July 31, 2022 (the “Fee Applications”). These Fee Applications include the following:

- A. Fortieth Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2022 through July 31, 2022 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 4/1/2022 to 7/31/2022, fee: \$36,219,512.79, expenses: \$286,456.71 (Filed: 10/31/2022) [ECF No. 22477]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2022 through July 30, 2022 for Schiltz & Schiltz, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$63,482.83, expenses: \$10,059.35 (Filed: 10/31/2022) [ECF No. 22478]
- C. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2022 through July 31, 2022 for Soroker Agmon Nordman, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$329,516.76, expenses: \$7,448.92 (Filed: 10/31/2022) [ECF No. 22479]
- D. Application of Addleshaw Goddard (Ireland) LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses from April 1, 2022 through July 31, 2022 for Addleshaw Goddard (Ireland) LLP, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$2,578.87, expenses: \$145.44 (Filed: 10/31/2022) [ECF No. 22480]
- E. Thirteenth Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for The Scaletta Law Firm, PLLC, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$706.86, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22481]

- F. Application of UGGC & Associés as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for UGGC & Associés, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$22,293.60, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22482]
- G. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2022 through July 31, 2022 for Browne Jacobson, LLP, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$91,555.22, expenses: \$8,572.71 (Filed: 10/31/2022) [ECF No. 22483]
- H. Application of Alpeggiani Studio Legale Associato as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for Alpeggiani Studio Legale Associato, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$12,049.86, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22484]
- I. Application of Kugler Kandestin, L.L.P. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for Kugler Kandestin, L.L.P., Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$15,076.71, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22485]
- J. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services from April 1, 2022 through July 31, 2022 for Monfrini Bitton Klein, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$32,590.57, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22486]
- K. Third Application of Bowman and Brooke LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for Bowman and Brooke, LLP, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$9,618.50, expenses: \$915.23 (Filed: 10/31/2022) [ECF No. 22487]
- L. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from December 1, 2021 through July 31, 2022 for Velitor Law, Special Counsel, period: 12/1/2021 to 7/31/2022, fee: \$2,349.00, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22488]
- M. Thirty-Ninth Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2022 through July 31, 2022 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$3,110,956.00, expenses: \$24,818.91 (Filed: 10/31/2022) [ECF No. 22489]

- N. Third Application of Lukins & Annis P.S. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2022 through July 31, 2022 for Lukins & Annis P.S., Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$1,498.50, expenses: \$0.00 (Filed: 10/31/2022) [ECF No. 22490]
- O. Fourth Application of La Tanzi, Spaulding & Landreth, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses from January 1, 2021 through July 31, 2022 for La Tanzi, Spaulding & Landreth, P.C., Special Counsel, period: 1/1/2021 to 7/31/2022, fee: \$1,007.50, expenses: \$1,727.50 (Filed: 10/31/2022) [ECF No. 22491]
- P. Thirty-Fifth Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2022 through July 31, 2022 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 4/1/2022 to 7/31/2022, fee: \$830,189.97, expenses: \$6,009.49 (Filed: 10/31/2022) [ECF No. 22492]

2. The deadline for filing objections to the Fee Applications expired on November 30, 2022 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for December 14, 2022 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no

party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the “Order”) that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: December 2, 2022  
New York, New York

By: /s/ David J. Sheehan  
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Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff*